

1 WRIGHT STANISH & WINCKLER
2 Karen C. Winckler
3 Bar No. 2809
4 200 South 4th Street Ste 701
5 Las Vegas, Nv. 89101
6 Counsel for Alan Rodrigues

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 * * *

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 ALAN L. RODRIGUES, WESTON J.
14 COOLIDGE, and JOSEPH PROKOP,

15 Defendants.

Case No.: 2:09-cr-022-MMD-GWF

**UNOPPOSED MOTION TO ORDER
THE BANKRUPTCY TRUSTEE TO
PROVIDE ACCESS TO MATERIALS
SEIZED FROM NADN OFFICES**

16 Karen C. Winckler, counsel for ALAN L. RODRIGUES , Assistant Federal
17 Public Defender Richard Boulware, counsel for WESTON J. COOLIDGE; and Travis
18 Shetler, counsel for JOSEPH PROKOP, move this Honorable Court to Order the
19 Bankruptcy Trustee William Leonard to provide access to materials seized from NADN
20 offices and to allow the defendants to assist counsel by joining with counsel and/or
21 paralegals at the Valley View storage unit which contains the seized evidence and is
22 controlled by Bankruptcy Trustee William Leonard.

23 The Government has no objection to this motion and has agreed to work with the
24 defendants to retrieve the seized office evidence.

25 This motion is made to allow counsel to review and copy, as needed, the seized
26 NADN materials controlled by the Bankruptcy Trustee. To facilitate the review of the
27 contents of the seized evidence, we request that the owner of NADN [Coolidge], the
28

office manager of NADN [Rodrigues] and a sales manager of the product [Prokop] to be allowed to participate in the review of their stored office documents at the storage unit. This will be a saving of both time and money for the defense by using the persons who know how to quickly identify the relevant materials for their defense.

DATED: July 11, 2012

RENE VALLADARES
Federal Public Defender

WRIGHT STANISH & WINCKLER

By: /s/
RICHARD BOULWARE
Assistant Federal Public Defender
Counsel for Defendant COOLIDGE

By: /s/
KAREN C. WINCKLER, ESQ.
Counsel for RODRIGUES

By: /s/
 TRAVIS SHETLER
 Counsel for Defendant Prokop

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4 UNITED STATES DISTRICT COURT
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8 UNITED STATES OF AMERICA,
9 Plaintiff,

Case No.: 2:09-cr-022-MMD-GWF

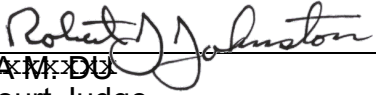
10 vs.

ORDER

11 ALAN L. RODRIGUES, WESTON J.
12 COOLIDGE, and JOSEPH PROKOP,
13 Defendants.

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15 Based upon the Motion of the Defendants, and good cause appearing, IT IS
16 HEREBY ORDERED that Bankruptcy Trustee William Leonard shall make available the
17 seized NADN evidence which he controls . Further, he shall allow defendants Weston
18 Coolidge, Al Rodrigues and Joseph Prokop to accompany counsel and/or case
19 paralegals to review and copy the evidence.

20 DATED: ~~July xxx, 2012~~ Aug. 15, 2012

21 
22 ~~MIRANDA M. DU~~
23 ~~District Court Judge~~
24 ~~xxxxxx~~

25 submitted by:
26 WRIGHT STANISH & WINCKLER
27 Karen C. Winckler
28 Bar No. 2809
200 South 4th Street Ste 701
Las Vegas, Nv. 89101
Counsel for Alan Rodrigues